

**IN THE UNITED STATES DISTRICT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANGEL RUIZ (#2011-1117242),)	
)	
Plaintiff,)	Case No. 14 C 1928
)	Hon. Manish S. Shah
vs.)	Hearing Date: August 7, 2014
)	Hearing Time: 9:45 a.m. C.S.T.
COOK COUNTY JAIL, <i>et al.</i> ,)	
)	
Defendants.)	

MOTION FOR LEAVE TO WITHDRAW

Movant, Patricia Susan Spratt ("Movant"), of Taft Stettinius & Hollister LLP ("Taft"), counsel for Plaintiff Angel Ruiz, hereby seeks leave to withdraw as counsel and in support states as follows:

1. By this Court's Order dated July 28, 2014, Movant was appointed counsel for Plaintiff under the District Court's Local Rule 83.37 (copy attached hereto as Exhibit A). Immediately following notice of her appointment, Movant caused a conflicts check to be performed within Taft to ensure that her representation of the Plaintiff did not create a conflict of interest with another client under Rule 1.7 of either the Illinois Rules of Professional Conduct or the ABA Model Rules of Professional Conduct, which have been adopted as the District Court's Local Rules of Professional Conduct.

2. The conflicts check disclosed that Taft has represented both Cook County and the Cook County Sheriff's Office in the recent past and currently represents the Cook County State's Attorney's Office (collectively, "the Client"). Accordingly, absent a waiver of the conflict by both the Plaintiff and the Client, Movant's continued representation of the Plaintiff is a violation of Rule 1.7.

3. Before contacting the Plaintiff, Movant inquired of the Client if it would waive the conflict. Movant was informed that the Client will not agree to waive the conflict. As a consequence, Movant may not represent the Plaintiff in this action without violating her professional ethical obligations to both the Plaintiff and the Client. Movant therefore seeks leave of this Court to withdraw as counsel for the Plaintiff.

WHEREFORE, Movant Patricia Susan Spratt, of Taft Stettinius & Hollister LLP, requests this Court grant her leave to withdraw as counsel for Plaintiff Angel Ruiz in this matter.

Dated: July 31, 2014

Respectfully submitted,

Patricia Susan Spratt, of
Taft Stettinius & Hollister LLP,
Movant

By: /s/ Patricia Susan Spratt

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